

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF ILLINOIS
EASTERN DIVISION

THURMAN ROSS, by and on behalf of himself and
all others similarly situated,

Plaintiff,

vs.

CAREER EDUCATION CORPORATION, GARY
E. McCULLOUGH, and MICHAEL J. GRAHAM,

Defendants.

Civil Action No. 12 C 276

Hon. John W. Darrah

**LEAD PLAINTIFFS' MOTION FOR FINAL APPROVAL OF CLASS
ACTION SETTLEMENT AND PLAN OF DISTRIBUTION OF SETTLEMENT
PROCEEDS AND AWARD OF ATTORNEYS' FEES AND EXPENSES**

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Additional Counsel for Plaintiffs

Co-Lead Plaintiffs KBC Asset Management NV, the Oklahoma Police Pension & Retirement System, and the Oklahoma Law Enforcement Retirement System, on behalf of the Class and pursuant to Rule 23 of the Federal Rules of Civil Procedure, respectfully move this Court to enter orders and/or judgments: (1) granting final approval of the settlement in the above-captioned litigation; (2) approving the Plan of Distribution of settlement proceeds; and (3) awarding attorneys' fees and expenses to Lead Counsel. This motion is based on the Memorandum of Points and Authorities in Support of Motion for Final Approval of Class Action Settlement and Plan of Distribution of Settlement Proceeds, the Memorandum of Points and Authorities in Support of Motion for Award of Attorneys' Fees and Expenses, the declarations submitted in support thereof, the Stipulation of Settlement dated October 25, 2013, all other pleadings and matters of record, and such additional evidence or argument that may be presented at the hearing on this matter.

Dated: March 17, 2014

Respectfully submitted,

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CERTIFICATE OF SERVICE

I, Scott F. Hessell, hereby certify that on March 17, 2014, I caused a true and correct copy of Lead Plaintiffs' Motion for Final Approval of Class Action Settlement and Plan of Distribution of Settlement Proceeds and Award of Attorneys' Fees and Expenses to be filed and served via the Court's Electronic Case Filing (ECF) system, with electronic notice sent to all registered users of the ECF system.

s/ Scott F. Hessell

Scott F. Hessell